

## **EXHIBIT 1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ORGANIZED COMMUNITIES	)	
AGAINST DEPORTATIONS;	)	
BRIGHTON PARK NEIGHBORHOOD	)	
COUNCIL; ILLINOIS COALITION	)	
FOR IMMIGRANT AND REFUGEE	)	
RIGHTS; and RAISE THE FLOOR	)	
ALLIANCE,	)	Case No. 25 CV 868
	)	
Plaintiffs,	)	
v.	)	
	)	
DONALD TRUMP; President of the	)	
United States; KRISTI NOEM, Acting	)	
Secretary of the United States	)	
Department of Homeland Security;	)	
CALEB VITELLO, Acting Director of	)	
Immigration and Customs	)	
Enforcement; EMIL BOVE, Acting	)	
Deputy Attorney General; THOMAS	)	
HOMAN, Border Czar; UNITED	)	
STATES OF AMERICA;	)	
DEPARTMENT OF HOMELAND	)	
SECURITY; IMMIGRATION and	)	
CUSTOMS ENFORCEMENT; and	)	
DEPARTMENT OF JUSTICE in their	)	
official capacities,	)	
	)	
Defendants.	)	

---

**DECLARATION OF SHEILA A. BEDI, COUNSEL FOR PLAINTIFF, IN SUPPORT  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION AND TEMPORARY  
RESTRAINING ORDER ENJOINING THE DEFENDANTS FROM CONDUCTING  
IMMIGRATION RAIDS IN CHICAGO INTENDED TO DESTROY THE SANCTUARY  
CITY MOVEMENT**

I, Sheila Bedi, declare under penalty perjury that the following is true and correct to the best  
of my knowledge and belief:

1) I am one of the attorneys for the Plaintiffs in the above captioned matter.

2) Shortly after midnight on January 25, 2025, Plaintiffs filed their complaint and accompanying Motion for a Temporary Restraining Order and Preliminary Injunction. (Doc. 1 & 2)

3) At 9:20am on January 25, 2025, undersigned Counsel provided notice of the complaint and Motion to the United States Attorney for the Northern District of Illinois. *See* Ex.1  
At or around 11:30am, undersigned counsel spoke with Craig Oswald, Assistant United States Attorney, Deputy Chief, Civil Division Office of the United States Attorney Northern District of Illinois. *See* Ex. 2.

4) At approximately 7pm on January 25, 2025, Plaintiffs amended their Motion. Plaintiffs made no substantive changes, but supported their Motion with declarations sworn by the Plaintiffs. (Doc. 7). At 7:14pm that day, undersigned counsel provided a copy of this filing to Mr. Oswald. *See* Ex. 3.

5) In the same correspondence, undersigned counsel asked Mr. Oswald if the federal government would enter into an agreement that would constrain the Defendants from threatening and/or executing Chicago-based immigration raids for the unlawful purpose of targeting and impeding the Sanctuary City movement. *Id.*

6) On January 26, 2025, The Chicago Sun-Times reported that:

Top Trump administration officials joined federal agents Sunday morning as they started making targeted immigration arrests across the Chicago area, capping off a week of fear and confusion. A spokesperson for U.S. Immigration and Customs Enforcement said a range of federal agencies were beginning to conduct “enhanced targeted operations” in Chicago.” *See* Ex. 4.

7) Additionally, also on January 26, Defendants Border Czar Tom Homan, and Acting Deputy Attorney General Emil Bove were photographed in Chicago. Upon information and belief they are present over oversee widespread immigration raids. *See* Ex. 5.

8) Finally, also on January 26, a video interview with Border Czar Tom Homan aired in which Mr. Homan stated of immigration law enforcement in Chicago “We’re going to show the American people why sanctuary cities are dangerous places.” *See* Ex. 6.

9) As of the time of this filing, the Defendants have not responded to Plaintiffs’ request for an agreement that would prohibit them from conducting immigration raids in violation of the Plaintiffs’ First Amendment rights.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NAUGHT

A handwritten signature in black ink, appearing to be 'S. Bedi', is written over a horizontal line.

Sheila A. Bedi

Dated: January 26, 2025

## **EXHIBIT 1**



Outlook

---

**Fw: Organized Communities Against Deportation v. Huffman (25-868), Urgent Request for an Emergency Hearing**

---

**From** Sheila A Bedi <sheila.bedi@law.northwestern.edu>

**Date** Sat 1/25/2025 9:20 AM

**To** USAILN.ECFSSAAUSA@usdoj.gov <USAILN.ECFSSAAUSA@usdoj.gov>; thomas.walsh2@usdoj.gov <thomas.walsh2@usdoj.gov>

**Cc** Sejal Zota <sejal@justfutureslaw.org>; Daniel Massoglia <dmassoglia@gmail.com>

 2 attachments (701 KB)

OCAD v Huffman 25cv869 TRO.pdf; OCAD v Huffman 25cv869 Complaint.pdf;

Counsel: On behalf of Plaintiff organizations Organized Communities Against Deportation, Brighton Park Neighborhood Council, Illinois Coalition for Immigrant and Refugee Rights and Raise the Floor Alliance, please find attached a complaint and TRO Plaintiff filed against the Benamine Huffman, Acting Secretary of the U.S. Department of Homeland Security, Caleb Vitello, Acting Director of Immigration and Customs Enforcement, and Immigration and Customs Enforcement. Plaintiffs' TRO Motion explains that the federal government's decision to target the Plaintiffs' communities because of its animus towards the Sanctuary City Movement is a clear violation of the First Amendment. Plaintiffs seek a temporary restraining order and preliminary injunction that would enjoin Defendants from threatening and/or executing Chicago-based immigration raids for the unlawful purpose of targeting and ultimately destroying the Sanctuary City movement.

Below, I've forwarded our correspondence with the Emergency Judges' chambers. Plaintiffs have requested that the court schedule an emergency hearing as soon as possible. If you would like to discuss this matter, I can be reached at 202-320-3435.

Sheila A. Bedi  
Clinical Professor of Law  
Director, Community Justice & Civil Rights Clinic  
Northwestern Pritzker School of Law  
375 E. Chicago Ave., 8th Floor  
Chicago, IL 60611  
T: [312-503-2492](tel:312-503-2492)  
Pronouns: she, hers  
Schedule a time to meet with me here: <https://calendly.com/sheila-bedi>

**From:** Sheila A Bedi

**Sent:** Saturday, January 25, 2025 12:24 AM

**To:** Emergency\_Judge@ilnd.uscourts.gov <Emergency\_Judge@ilnd.uscourts.gov>

**Cc:** Daniel Massoglia <dmassoglia@gmail.com>; Sejal Zota <sejal@justfutureslaw.org>

**Subject:** Organized Communities Against Deportation v. Huffman (25-868), Urgent Request for an Emergency Hearing

Dear Judge Johnson-Coleman:

Pursuant to Local Rule 77.2, and on behalf of the Plaintiffs in the attached filings, I write to request an emergency hearing on the attached Temporary Restraining Order at the earliest possible time. The Plaintiffs are all Chicago-based organizations that provide advocacy and support to Chicago's immigrant communities. They are also leaders in the Sanctuary City Movement. Plaintiffs filed the attached lawsuit against Benamine Huffman, the Acting Secretary of the Department of Homeland Security, and other federal government officials seeking to enjoin the federal government from targeting their Chicago communities with immigration raids in an effort to destroy the Sanctuary City movement. The Plaintiffs' TRO Motion explains that the federal government's decision to target the Plaintiffs' communities because of its animus towards the Sanctuary City movement is a clear violation of the First Amendment. Plaintiffs seek a temporary restraining order and preliminary injunction that would enjoin Defendants from threatening and/or executing Chicago-based immigration raids for the unlawful purpose of targeting and ultimately destroying the Sanctuary City movement.

We will provide a copy of this filing and this email to the U.S. Attorney's office. Should your chambers need to discuss this matter, I can be reached at 202-320-3435.

Thank you for your consideration,

Sheila A. Bedi  
Clinical Professor of Law  
Director, Community Justice & Civil Rights Clinic  
Northwestern Pritzker School of Law  
375 E. Chicago Ave., 8th Floor  
Chicago, IL 60611  
T: [312-503-2492](tel:312-503-2492)  
Pronouns: she, hers  
Schedule a time to meet with me here: <https://calendly.com/sheila-bedi>

## **EXHIBIT 2**





---

## Re: Organized Communities Against Deportation v. Huffman (25-868), Urgent Request for an Emergency Hearing

---

**From** Sheila A Bedi <sheila.bedi@law.northwestern.edu>  
**Date** Sat 1/25/2025 11:58 AM  
**To** craig.oswald@usdoj.gov <craig.oswald@usdoj.gov>  
**Cc** dmassoglia <dmassoglia@gmail.com>; sejal <sejal@justfutureslaw.org>

Craig: Thank you for your call this morning about the above referenced case. Below, you'll find our communications with the Emergency Judge's Chambers. Moving forward, we'll cc you on all communications with the Court. Best, s

---

**From:** Emergency\_Judge\_ILND <Emergency\_Judge\_ILND@ilnd.uscourts.gov>  
**Sent:** Saturday, January 25, 2025 8:38 AM  
**To:** Sheila A Bedi <sheila.bedi@law.northwestern.edu>  
**Cc:** Daniel Massoglia <dmassoglia@gmail.com>; Sejal Zota <sejal@justfutureslaw.org>  
**Subject:** Re: Organized Communities Against Deportation v. Huffman (25-868), Urgent Request for an Emergency Hearing

I did see the motion on the docket. The case will need assignment of a District Judge before a hearing can happen on your motion. The Assigned Judge may want to hear this motion instead of the Emergency Judge. You may want to follow up with the Clerk's Office on Monday morning regarding how soon can the case be assigned. Judge Coleman will have availability to hear the motion anytime on Monday after 10:15 am, if the Assigned Judge is unable to hear it. For Judge Coleman since she will have the availability, you can present witnesses and evidence at the hearing.

Sent from my iPhone

On Jan 25, 2025, at 7:44 AM, Sheila A Bedi <sheila.bedi@law.northwestern.edu> wrote:

### **CAUTION - EXTERNAL:**

Good morning: We filed the motion on the case docket early this morning. We appreciate the Court accommodating us on Monday. At Monday's hearing, does the Court anticipate hearing any witness testimony or accepting any evidence? Thank you, s

On Jan 25, 2025, at 6:25 AM, Emergency\_Judge\_ILND  
<Emergency\_Judge\_ILND@ilnd.uscourts.gov> wrote:

Good morning,

Judge Coleman does have availability to hear an emergency motion on Monday, 1/27 at 10:30 am. Has the motion been filed on the case docket?

Yvette

Sent from my iPhone

On Jan 25, 2025, at 12:25 AM, Sheila A Bedi  
<sheila.bedi@law.northwestern.edu> wrote:

**CAUTION - EXTERNAL:**

Dear Judge Johnson-Coleman:

Pursuant to Local Rule 77.2, and on behalf of the Plaintiffs in the attached filings, I write to request an emergency hearing on the attached Temporary Restraining Order at the earliest possible time. The Plaintiffs are all Chicago-based organizations that provide advocacy and support to Chicago's immigrant communities. They are also leaders in the Sanctuary City Movement. Plaintiffs filed the attached lawsuit against Benjamine Huffman, the Acting Secretary of the Department of Homeland Security, and other federal government officials seeking to enjoin the federal government from targeting their Chicago communities with immigration raids in an effort to destroy the Sanctuary City movement. The Plaintiffs' TRO Motion explains that the federal government's decision to target the Plaintiffs' communities because of its animus towards the Sanctuary City movement is a clear violation of the First Amendment. Plaintiffs seek a temporary restraining order and preliminary injunction that would enjoin Defendants from threatening and/or executing Chicago-based immigration raids for the unlawful purpose of targeting and ultimately destroying the Sanctuary City movement.

We will provide a copy of this filing and this email to the U.S. Attorney's office. Should your chambers need to discuss this matter, I can be reached at 202-320-3435.

Thank you for your consideration,

Sheila A. Bedi  
Clinical Professor of Law  
Director, Community Justice & Civil Rights Clinic  
Northwestern Pritzker School of Law  
375 E. Chicago Ave., 8th Floor  
Chicago, IL 60611  
T: [312-503-2492](tel:312-503-2492)  
Pronouns: she, hers  
Schedule a time to meet with me here: <https://calendly.com/sheila-bedi>

**CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.**

<OCAD v Huffman 25cv869 TRO.pdf>  
<OCAD v Huffman 25cv869 Complaint.pdf>

**CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.**

### **EXHIBIT 3**



Outlook

---

## 25 CR 868 Organized Communities Against Deportations et al v. BENJAMINE HUFFMAN et al

---

**From** Sheila A Bedi <sheila.bedi@law.northwestern.edu>

**Date** Sat 1/25/2025 7:14 PM

**To** Craig.Oswald@usdoj.gov <Craig.Oswald@usdoj.gov>

**Cc** sejal <sejal@justfutureslaw.org>; dinesh <dinesh@justfutureslaw.org>; dmassoglia <dmassoglia@gmail.com>

 5 attachments (2 MB)

7 Amended TRO.pdf; 7-1.pdf; 7-2.pdf; 7-3.pdf; 7-4.pdf;

Craig: I've attached Plaintiffs' just filed amended Motion for a TRO/PI. There are no substantive changes, but the factual allegations are supported by declarations sworn by the Plaintiffs, which I've also attached. In light of Plaintiffs' filings, will the federal government agree to enter into an agreement that would constrain the Defendants from threatening and/or executing Chicago-based immigration raids for the unlawful purpose of targeting and impeding the Sanctuary City movement? Media reports from today indicate that the Defendants will launch widespread raids in Chicago beginning Tuesday—so if there's a possibility Plaintiffs' claims can be resolved without further litigation we should speak before Monday morning. You can reach me at 202-320-3435 anytime. Thanks, s

Sheila A. Bedi  
Clinical Professor of Law  
Director, Community Justice & Civil Rights Clinic  
Northwestern Pritzker School of Law  
375 E. Chicago Ave., 8th Floor  
Chicago, IL 60611  
T: [312-503-2492](tel:312-503-2492)  
Pronouns: she, hers  
Schedule a time to meet with me here: <https://calendly.com/sheila-bedi>

**EXHIBIT 4**

The Sun-Times is free but the journalism is not. Reader support powers the news. Here's how you can help.



Log In

Donate



## IMMIGRATION

LIVE

# Feds start making immigration arrests across Chicago area: Live updates

Trump border czar Tom Homan and TV personality Dr. Phil are in the city to observe the operations, according to reports.

Last Updated: January 26, 2025 12:29 PM

By WBEZ and Chicago Sun-Times staff | January 26, 2025 at 12:25 PM



U.S. Drug Enforcement Agency officers were participating in immigration enforcement actions in Chicago Sunday, according to a post on X by the agency. | DEA/Provided



SHARE



COPY LINK

Top Trump administration officials joined federal agents Sunday morning as they started making targeted immigration arrests across the Chicago area, capping off a week of fear and confusion.

A spokesperson for U.S. Immigration and Customs Enforcement said a range of federal agencies were beginning to conduct “enhanced targeted operations” in Chicago “to enforce U.S. immigration law and preserve public safety and national security by keeping potentially dangerous criminal aliens out of our communities.”

Ald. Daniel La Spata (1st) said federal officials were conducting operations in Logan Square.

The arrests were targeted across the Chicago area and didn’t affect churches or workplaces, according to a source with knowledge of the situation.

Acting Deputy Attorney General Emil Bove and border czar Tom Homan spoke to officials from ICE and the U.S. Drug Enforcement Administration, according to photos posted on the X account for the DEA’s Chicago office.

“The DEA, along with our Department of Justice partners, is assisting [Department of Homeland Security] and other federal law enforcement partners with their immigration enforcement efforts,” DEA spokesman Luis Agostini.

Another photo shared on the social media platform showed a U.S. Customs and Border Patrol official working alongside officials from the DEA and the federal Bureau of Alcohol, Tobacco, Firearms and Explosives.

The ICE spokesperson said the FBI and the U.S. Marshals Service were also aiding the operations.

No further details of the operations, including locations or number of arrests, had been made public.

A U.S. Department of Justice spokesperson told the Associated Press that Emil Bove, President Donald Trump’s top appointee in the agency, is in Chicago to observe the operations.

Media personality Dr. Phil posted on X that he is embedded with Homan for an ICE operation in the city, and that footage would be on [his streaming service MeritTV](#).

## What you need to know

- **Top officials in Chicago:** Trump’s “border czar” Tom Homan and a top Department of Justice official are observing operations.
- **Chicago groups sue Trump administration:** Several local groups are suing the Trump administration over its deportation plans.
- **¿Cuáles son mis derechos si hay una redada?:** What to know about your rights in the event of an immigration raid.

---

16m ago

Dr. Phil says he’s embedded with ICE operations in Chicago

By Ellery Jones



Media personality Dr. Phil posted a video on X saying he is in Chicago embedded with Trump border czar Tom Homan for immigration operations today.

Dr Phil is embedded with [@RealTomHoman](#) for ICE operation in Chicago.

— Dr. Phil  
(@DrPhil) January 26, 2025

For full live coverage of the operation, download the MeritTV app.

[pic.twitter.com/PKkZRZzq5](https://pic.twitter.com/PKkZRZzq5)

A chyron on his [streaming service MeritTV](#) said that it would soon broadcast video of Dr. Phil at an ICE arrest in Chicago.

---

18m ago

Acting deputy AG head visits Chicago to ‘observe’ immigration enforcement operations

By AP



Acting Deputy Attorney General Emil Bove visited Chicago on Sunday to “personally observe” **immigration** enforcement operations long touted by President Donald Trump.

No further details of the operations, including locations or number of arrests, were made public Sunday.



Bove was in the nation’s third-largest city “to personally observe Department of Homeland Security immigration enforcement operations” and support the efforts of assisting federal agencies — including the FBI and the Bureau of Alcohol, Tobacco, Firearms & Explosives, according to U.S. Department of Justice spokesman Chad Gilmartin.

Messages left for U.S. Immigration and Customs Enforcement, ATF and FBI officials were not immediately returned.

Chicagoans, especially in immigrant circles, have already been **on edge for months** in anticipation of large-scale immigration arrests promised by the Trump administration.

Immigrant rights groups have tried to prepare with campaigns for immigrants to know their rights in case of an arrest. City officials have done the same, publishing similar information at hundreds of public transit stations.

On Friday, Chicago Public Schools officials **mistakenly believed ICE agents had come to a city elementary school** and put out statements to that effect before learning the agents were from the Secret Service. Word of immigration agents at a school — which have long been off limits to immigration agents until Trump ended the policy last week — drew swift criticism from community groups and Gov. JB Pritzker.

The governor, a frequent Trump critic, questioned the operations and targeting immigrants.

“We need to get rid of the violent criminals. But we also need to protect people, at least the residents of Illinois and all across the nation, who are just doing what we hope that immigrants will do,” Pritzker said Sunday on CNN’s “State of the Union.”

Chicago has been one of Trump’s favorite targets. The city has some of the strongest sanctuary protections, which bar cooperation between city police and immigration agents.

---

January 26, 2025

---

16m ago

Dr. Phil says he’s embedded with ICE operations in Chicago

18m ago

Acting deputy AG head visits Chicago to ‘observe’ immigration enforcement operations

\*

[About Us](#) • [Newsletters](#) • [Get Home Delivery](#) • [Work With Us](#) • [Media Kit](#) • [Terms of Use](#) • [Privacy Notice](#) • [Cookie Policy](#) • [Terms of Sale](#)



© 2025 CHICAGO SUN-TIMES MEDIA, INC.

**EXHIBIT 5**



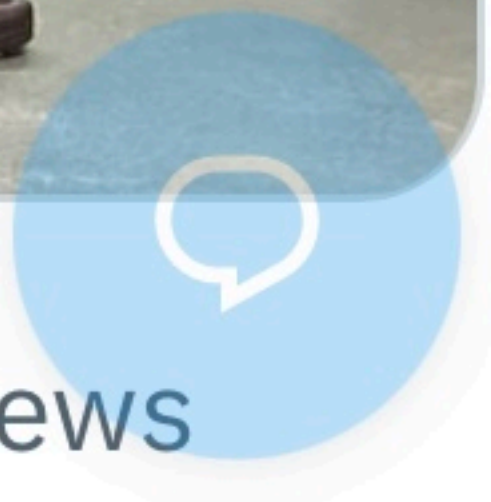


**Mary Ann Ahern**

@MaryAnnAhernNBC



Border Czar Tom Homan and Acting Deputy AG in Chicago this morning.



9:33 AM · Jan 26, 2025 · **35.9K** Views



**EXHIBIT 6**

The Sun-Times is free but the journalism is not. Reader support powers the news. Here's how you can help.



Log In

Donate



IMMIGRATION

LIVE

## Feds start making immigration arrests across Chicago area: Live updates

Trump border czar Tom Homan and TV personality Dr. Phil are in the city to observe the operations, according to reports.

Last Updated: January 26, 2025 01:30 PM

By WBEZ and Chicago Sun-Times staff | January 26, 2025 at 12:25 PM

U.S. Drug Enforcement Agency officers were participating in immigration enforcement actions in Chicago Sunday, according to a post on X by the agency. | DEA/Provided



Top Trump administration officials joined federal agents Sunday morning as they started making targeted immigration arrests across the Chicago area, capping off a week of fear and confusion.

A spokesperson for U.S. Immigration and Customs Enforcement said a range of federal agencies were beginning to conduct “enhanced targeted operations” in Chicago “to enforce U.S. immigration law and preserve public safety and national security by keeping potentially dangerous criminal aliens out of our communities.”

Ald. Daniel La Spata (1st) said federal officials were conducting operations in Logan Square but not in his ward.

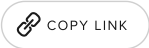
The arrests were targeted across the Chicago area and didn’t affect churches or workplaces, according to a source with knowledge of the situation.

Acting Deputy Attorney General Emil Bove and border czar Tom Homan spoke to officials from ICE and the U.S. Drug Enforcement Administration, according to photos posted on the X account for the DEA’s Chicago office.

1h ago

## Border czar: ‘Several hundred’ targets in Chicago

By Ellery Jones



In a pre-taped interview from Saturday, Trump border czar Tom Homan told media personality Dr. Phil that ICE has identified “several hundred” targets in Chicago.

The interview aired Sunday morning on Dr. Phil’s streaming service, MeritTV.

Homan said the operation was targeting immigrants accused of crimes in Chicago. It will be a “big operation” with hundreds of vehicles in multiple locations, Homan told Dr. Phil.

Dr. Phil has said that MeritTV would livestream the operation in Chicago once Homan and ICE give the go-ahead.

Dr. Phil

@DrPhil · Follow

Dr Phil is embedded with @RealTomHoman for ICE operation in Chicago.

For full live coverage of the operation, download the MeritTV app.

Watch on X

12:25 PM · Jan 26, 2025

1.6K

Reply

Copy link

Read 104 replies

“We’re going to show the American people why sanctuary cities are dangerous places,” Homan told Dr. Phil at the end of the interview.

2h ago

## Acting deputy AG: ‘We will not rest until the work is done’

By AP Staff

